REMARKS

I. Introduction

In response to the Office Action dated July 27, 2005, claims 1, 14, and 27 have been amended. Claims 1-39 remain in the application. Re-examination and re-consideration of the application, as amended, is requested.

II. Prior Art Rejections

In paragraph (3) of the Office Action, claims 1, 2, 4, 9-15, 17, 22-28, 30, and 35-39 were rejected under 35 U.S.C. §103(a) as being unpatentable over Beezer et al. (Beezer), U.S. Patent No. 6,597,314 in view of Gudorf et al. (Gudorf), U.S. Publication No. 2002/0174230. In paragraph (4) of the Office Action, claims 3, 5-7, 16, 18-20, 29, and 31-33 were rejected under 35 U.S.C. §103(a) as being unpatentable over Beezer, in view of Gudorf, and further in view of Lim et al. (Lim), U.S. Patent No. 6,434,619. In paragraph (5) of the Office Action, claims 8, 1, and 34 were rejected under 35 U.S.C. §103(a) as being unpatentable over Beezer, in view of Gudorf, and further in view of Werner, U.S. Publication No. 2002/0196942.

Specifically, claims 1, 14, and 27 were rejected as follows:

> As to claim 1, as illustrated in Fig. 3, and as described (column 4, lines 55-63), Beezer discloses a computer-implemented 200 method for presenting a series of titles 310 (help source file) of a document to a user.
>
> As per the step of "maintaining a help", the method of Beezer includes presenting (maintaining) a set of help topics or series of titles to be selected by a user (column 4, lines 55-63);
>
> As per the step of "receiving request", the method of Beezer includes receiving a signal corresponding to a user request for the help and settings control document (column 9, lines 16-17 of claim 2).
>
> As per the step of "obtaining a help", the method of Beezer includes determining (obtaining) the target part of the help and settings control document based on a navigational history associated with the user (column 6, lines 46-56, column 9, lines 6-10 of claim 1);
>
> As per the step of "displaying", the method of Beezer further includes displaying a configured (customized) display of the help and settings control document (help source file) based on stored navigational history component 704 and user profile component 708 (column 7, lines 53-column 8, lines 22).
>
> Beezer, however, does not teach, "the help history file comprises a cookie, wherein an identification for each previously opened file is stored in the cookie." Gudorf, on the other hand, teaches Cookies 110 stored on the computer platform 98 provide information as to previously viewed on-line content (paragraph 46). At the time of the invention, it would have been obvious to a person or ordinary skill in the art to substitute the cookie of Gudorf for the pointer of Beezer because the help document of Beezer will be able to identify the user and matches user's activity when a user logs for the second time, i.e., the user does not have to retype the previously entered information.
>
> Therefore, it would have been obvious to combine Beezer with Gudorf to obtain the invention as specified in claim 1.

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With regard to claims 14, 15, 17, and 22-26, Beezer in view of Gudorf is also directed and discloses a computer-implemented help system reciting all the limitations of these claims in system form (e.g., see Beezer, claim 1). Thus, since these claims correspond generally to method claims 1, 2, 4, 9-13, respectively, and recite similar features in system form, and therefore are rejected under the same rationale.

With regard to claims 27, 28, 30, and 35-39, Beezer in view of Gudorf is also directed and discloses a computer-readable medium having stored thereon computer-executable instructions for performing a method of providing a user access to help and settings control document (e.g., see Beezer, claim 5). Thus, since these claims correspond generally to method claims 1, 2, 4, 9-13, respectively, and recite similar features in storage form, and therefore are rejected under the same rationale.

Applicant traverses the above rejections for one or more of the following reasons:

(1)   Neither Beezer, Gudorf, Lim, nor Werner teach, disclose or suggest the processing of all of the method steps on a local computer;

(2)   Neither Beezer, Gudorf, Lim, nor Werner teach, disclose or suggest a help history file that is stored in a cookie, wherein the cookie is generated by the local computer; and

(3)   Neither Beezer, Gudorf, Lim, nor Werner teach, disclose or suggest the storage of an an identification for each previously opened help file in a cookie.

Independent claims 1, 14, and 27 are generally directed to displaying a customized presentation of one or more help files on a local computer. Specifically, after receiving a request for a help file on the local computer, a help history file is obtained from the local computer. The help history file has a number of specific attributes. For example, the help history file stores information relating to a usage of the help system. To store this information, the help history file comprises a cookie that is generated on the local computer, and each time a help file is opened an identification for the opened help file is stored in the cookie. Thus, the cookie stores the user's current location within a help system and a history of which help files the user has opened.

In rejecting the claims, the Action primarily relies on Beezer. Beezer merely describes a method and apparatus for providing user access to help and settings control in a system for viewing electronic books includes single document integrating help features and settings controls may be accessed in a single-window or single page viewing environment. The help and settings document may be accessed from a number of different contexts, including a library page or from within a book. "Smart" navigational features are provided for predicting a part, section or chapter of the help and settings document that is sought by a user based on navigational history and user profiles. Feedback as to the accuracy of predictions made by the "smart" navigation is also provided.

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However, Beezer lacks any discussion about cookies and identification for opened help files being stored in cookies. Instead, Beezer teaches away from Applicant's invention because it specifically describes the use of pointers to determine which part, section or chapter a user navigates to (see col. 7, lines 21-24). In fact, the Office Action admits the lack of Beezer's teaching with respect to cookies, and relies on Gudorf to teach these claim elements.

The cited portion of Gudorf and the remainder of Gurdorf merely provide:

> Cookies 110 stored on the computer platform 98 provide information as to previously viewed on-line content, which may augment ongoing tracking of navigation click stream 112.

Such a quote fails to teach the claim elements in numerous regards. Firstly, the claims specifically provide that an identification for each previously opened help file is stored in the cookie. Gudorf does not disclose what information is stored in the content at all. In this regard, Gudorf merely states that information as to previously viewed on-line content is stored in the cookie. Such information could merely be a category or type of content viewed, a time that content was viewed, or many other types of information. Accordingly, the specific claim limitations are not even remotely hinted at in Gudorf.

In addition to the lack of teaching the identification, Gudorf also fails to describe that the cookie is generated by the local computer. In this regard, the remaining context of Gudorf refers to online viewing via the internet. Thus, consistent with the common use of cookies, the cookie of Gudorf is likely merely created by a server computer for a website. In this regard, there is nothing in Gudorf that hints or alludes to a use of a cookie to obtain content other than in the well-known use of a cookie.

The Office Action also admits to the lack of such a locally generated cookie in its rejection of claims 8, 21, and 34. Instead, the action relies on Werner. However, contrary to that asserted in the Action, Werner does not even remotely suggest that the cookie is generated by the local computer. Instead, Werner states that the cookie file is created on a client computer 502. Cookies are commonly created and then placed onto a client computer. In addition, Werner provides that the location information from a location information resource that is present on the client computer (and indicates the location of the client computer) is written into the cookie file. Thus, rather than a local computer generating the cookie, Werner is merely consistent with the prior art in that a cookie is created and information is then placed into the cookie. Further, rather than the cookie file containing the help history and an identification of files opened, Werner's cookie merely identifies

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the location of the computer. Such a use of a cookie to store a location of a computer is not even remotely similar to the usage of the present invention.

While Applicant acknowledges that one cannot show non-obviousness by attacking references individually where the rejections·are based on combinations of references, the claimed invention must also be examined as a whole and whether the "whole" claimed invention would have been obvious at the time of invention (see MPEP §2142). Viewing the present invention as a whole provides for not only generating a cookie locally by the client computer but also providing that the information stored in the local computer is generated and obtained locally. In this regard, the help history file is obtained from the local computer. Further, the history file contains information relating to the help files used/viewed by the user. Such a teaching is not described, suggested, or hinted at by any of the cited references, either alone, or in combination.

Again, the concept of the present invention as claimed provides for a local help system (and not a web or internet based help system), wherein the use of the help system is monitored by creating a help history file. The help history file is comprised of a cookie that is generated locally and contains an identification for each previously opened help file. Such a teaching is completely lacking from all of the cited references. The references either teach the use of a cookie in a network/online based environment wherein info relating to web sites accessed are stored or for storing a location of a computer. However, none of the references are used in the specific manner set forth in the independent claims.

Moreover, the various elements of Applicant's claimed invention together provide operational advantages over Beezer, Gudorf, Lim and Werner. In addition, Applicant's invention solves problems not recognized by Beezer, Gudorf, Lim and Werner.

Thus, Applicant submits that independent claims 1, 14, and 27 are allowable over Beezer, Gudorf, Lim and Werner. Further, dependent claims 2-13, 15-26, and 28-39 are submitted to be allowable over Beezer, Gudorf, Lim and Werner in the same manner, because they are dependent on independent claims 1, 14, and 27, respectively, and thus contain all the limitations of the independent claims. In addition, dependent claims 2-13, 15-26, and 28-39 recite additional novel elements not shown by Beezer, Gudorf, Lim and Werner.

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III.   Conclusion

In view of the above, it is submitted that this application is now in good order for allowance and such allowance is respectfully solicited. Should the Examiner believe minor matters still remain that can be resolved in a telephone interview, the Examiner is urged to call Applicant's undersigned attorney.

Respectfully submitted,

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